

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

NELITA TORRES ORTIZ

DEBTOR

CASE NO. 19-06358/MCF

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME
TO REPLY TO MOTION TO DISMISS, DOCKET NO. 120**

TO THE HONORABLE COURT:

NOW COMES, NELITZA TORRES ORTIZ, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On November 4, 2024, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 120, alleging that the Debtor has defaulted in her Plan payments in the sum of \$7,227.00.

2. On December 4, 2024, the Debtor met with her undersigned attorney and respectfully states that she is in the process obtaining the monies to cure the Plan arrears in the present case.

3. The Debtor respectfully requests additional time of thirty (30) days within to cure the arrears and file a reply to the *Trustee's Motion to Dismiss*, Docket No. 120. This extension of time to expire on January 03, 2025.

WHEREFORE, based on the above stated, the Debtor respectfully prays that the Honorable Court grant the present motion and grant the requested extension of time to reply to the *Trustee's Motion to Dismiss*, Docket No. 120, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor to her address of record.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 4th day of December 2024.

/s/ Roberto Figueroa Carrasquillo
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